

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

IN RE: APRIL C. YOUNG

CHAPTER 13
CASE NO. 17-05173-RLM-13

DEBTOR

AMENDED MOTION TO MODIFY
CHAPTER 13 PLAN POST-CONFIRMATION
WITH NOTICE OF OBJECTION DEADLINE

COMES NOW the Debtor, by counsel, and respectfully moves the Court pursuant to §1329 to modify the Debtor's Chapter 13 Plan, and would show the court as follows:

1. The Court has jurisdiction over this proceeding pursuant to 28 U.S.C. § 1334;
2. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A);
3. Debtor filed a Voluntary Petition for relief under Chapter 13 on July 12, 2017 and the Court confirmed the Debtor's Chapter 13 plan on August 25, 2017;
4. On or about June 22, 2018, the Debtor took sick leave from work due to her condition of deteriorating health and the Debtor just recently returned to work in March 2019.
5. Now, for good cause shown, the Debtor requests the Court to enter an order modifying the confirmed Chapter 13 plan to wit:
 - a. Extend the plan period from 36 months to 42 months (six months) to cure the arrearage in payments to the trustee (\$583.39)

- b. The Debtor therefore proposes to pay the aggregate of \$1,434.61 through and including March 2019 (20 months); thereafter, Debtor shall pay \$100.00 per month continuing for 22 months (\$2,200.00) for a new 42-month plan base of \$3,616.61¹.
6. The Debtor, and her employer, remain on an active wage withholding assignment² under which the employer has already began again remitting payments to the trustee.
7. The plan as confirmed should otherwise remain unchanged and the modification as proposed results in a higher plan base than previously confirmed.

WHEREFORE, the Debtor moves the Court to modify the Chapter 13 plan as proposed and for all other such relief deemed just and proper in the premises.

Respectfully Submitted,
LEWIS LEGAL SERVICES, P.C.

/s/ Eric C. Lewis

Eric C. Lewis, Esq. #28282-49

1060 E. 86th Street

P.O. Box 40603

Indianapolis, IN 46240

Phone: (317) 623-3030 x3

Fax : (317) 623-3062

E-Mail: lewislegal@live.com

¹ Plan base does not include partial tax refunds paid or to be paid under the plan, for tax years 2017 (paid \$18.00), 2018, and 2019.

² Order Directed to Employer to Remit Under Wage Assignment entered August 2, 2017 (dn 19)

NOTICE OF OBJECTION DEADLINE

PLEASE TAKE NOTICE that any objection must be filed with the Bankruptcy Clerk within **twenty-one (21) days** of the date of this notice (or such other time period as may be permitted by Fed. Bankr. P. 9006(f)). Those not required or not permitted to file electronically must deliver any objection by U.S. mail, courier, overnight/express mail, or in person at:

Clerk of the U.S. Bankruptcy Court
116 U.S. Courthouse
46 E. Ohio Street
Indianapolis, IN 46204

The objecting party must ensure delivery of the objection to the party filing the motion.

If an objection is NOT timely filed, the requested relief may be granted.

CERTIFICATE OF SERVICE

The undersigned attorney does hereby certify that on **April 10, 2019**, a copy of the foregoing Motion to Modify Confirmed Chapter 13 Plan was filed electronically and notice thereof will be sent to the following parties through the Electronic Case Filing System and the attached mailing matrix

:

Nancy J. Gargula, U.S. Trustee
Ustpreion10.in.ecf@usdoj.gov

Ann M. DeLaney, Chapter 13 Trustee

/s/ Eric C. Lewis
Eric C. Lewis, Esq. #28282-49
1060 E. 86th Street
P.O. Box 40603
Indianapolis, IN 46240
Phone: (317) 623-3030 x3
Fax : (317) 623-3062
E-Mail: lewislegal@live.com

Label Matrix for local noticing
0756-1
Case 17-05173-RLM-13
Southern District of Indiana
Indianapolis
Tue Feb 5 11:52:07 EST 2019

American Infosource
P.O. Box 248838
Oklahoma City, OK 73124-8838

ECMC
P.O. Box 16478
Saint Paul, MN 55116-0478

Friendly Finance Corporation
6340 Security Blvd. Suite 200
Gwynn Oak, MD 21207-5161

IMC Credit Services
P.O. Box 20636
Indianapolis, IN 46220-0636

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Lewis Legal Services, P.C.
1060 E. 86th Street
P.O. Box 40603
Indianapolis, IN 46240-0603

Med-1 Solutions c/o Atty Richard Huston
517 US Highway 31 North
Greenwood, IN 46142-3932

Obstetrics & Gynecology of Indiana
One Penn Mark Plaza
11595 N. Meridian St.
Carmel, IN 46032-6947

Premier Bankcard, Llc
Jefferson Capital Systems LLC Assignee
Po Box 7999
Saint Cloud Mn 56302-7999

AFNI
P.O. Box 3517
1310 Martin Luther King Drive
Bloomington, IL 61701-1465

Community Health Network
P.O. Box 20830
Indianapolis, IN 46220-0830

Eagle Accounts Group Inc.
P.O. Box 7012
Indianapolis, IN 46207-7012

Friendly Finance Corporation
c/o Jack H. Frisch, Esq.
9247 N. Meridian St. Suite 107
Indianapolis, IN 46260-1813

Indiana Dept of Revenue
100 N. Senate Ave
N203 Bankruptcy
Indianapolis, IN 46204

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

Med Shield
P.O. Box 55707
Indianapolis, IN 46205-0707

Mid America Bank & Trust
Total Visa
PO Box 91510
Sioux Falls, SD 57109-1510

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Quantum3 Group LLC as agent for
Sadino Funding LLC
PO Box 788
Kirkland, WA 98083-0788

Aargon Agency Inc
8668 Spring Mountain Rd
Las Vegas, NV 89117-4132

Directv, LLC
by American InfoSource LP as agent
PO Box 5008
Carol Stream, IL 60197-5008

Educational Credit Management Corporation
PO BOX 16408
ST. PAUL, MN 55116-0408

(p)G L A COLLECTION CO INC
PO BOX 588
GREENSBURG IN 47240-0588

Indiana Surgery Center
P.O. Box 19202
Indianapolis, IN 46219-0202

LVNV Funding, LLC its successors and assigns
assignee of Arrow Financial Services,
LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Med-1 Solutions
Tara Gerber, Esq.
517 U.S. Highway 31 North
Greenwood, IN 46142-3932

NWR
5901 Technology Center Drive
Indianapolis, IN 46278-6013

Premier Bankcard
P.O. Box 2208
Vacaville, CA 95696-8208

Resurgent Capital Services
55 Beattie Place
Suite 110 MS 604
Greenville, SC 29601-5115

Resurgent Capital Services
P.O. Box 10587
Greenville, SC 29603-0587

(p) SPRINT NEXTEL CORRESPONDENCE
ATTN BANKRUPTCY DEPT
PO BOX 7949
OVERLAND PARK KS 66207-0949

St. Vincent Hospital
by American InfoSource LP as agent
PO Box 248838
Oklahoma City, OK 73124-8838

The Huntington National Bank
PO Box 89424
Cleveland, OH 44101-6424

U.S. Attorney's Office
10 W Market St Ste 2100
Indianapolis IN 46204-1986

U.S. Trustee
Office of U.S. Trustee
101 W. Ohio St.. Ste. 1000
Indianapolis, IN 46204-1982

U.S. Dept of Education
2401 International
POB 7859
Madison, WI 53707-7859

Unique National Collections
119 E. Maple St.
Jeffersonville, IN 47130-3439

Verizon
by American InfoSource LP as agent
PO Box 248838
Oklahoma City, OK 73124-8838

Windham Professionals, Inc.
P.O. Box 1048
Salem, NH 03079-1048

Ann M. DeLaney
Office of Ann M. Delaney
PO Box 441285
Indianapolis, IN 46244-1285

April C. Young
5617 N. Plymouth Ct.
Mc Cordsville, IN 46055-9469

Eric C. Lewis
Lewis Legal Services, P.C.
1060 East 86th Street
P.O. Box 40603
Indianapolis, IN 46240-0603

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

GLA Collection Co Inc.
2630 Gleeson Lane
Louisville, KY 40299

Jefferson Capital System
16 Mcleland Rd.
Saint Cloud, MN 56303-2198

Portfolio Recovery Associates LLC
140 Corporate Blvd.
Norfolk, VA 23502

Sprint Communications
P.O. Box 4191
Carol Stream, IL 60197

End of Label Matrix
Mailable recipients 42
Bypassed recipients 0
Total 42